

# CHALOS, O'CONNOR & DUFFY

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November 6, 2006

VIA FEDERAL EXPRESS

United States District Court - District of Delaware  
Clerk of the Court - Room 4209  
844 N. King Street  
Wilmington, DE 19801



Attn: Clerk of the Court

Re: United States of America v. Chian Spirit Maritime Enterprises, et al.  
Criminal No. 06-76 GMS

Dear Clerk of the Court:

We are counsel for defendants, Chian Spirit Maritime Enterprises, Inc. and Venetico Marine S/A, and write in connection with the above referenced criminal matter and further to our telecon with your good office earlier today. In this regard, we enclose the following Pre-Trial Motions for filing on behalf of the above mentioned Defendants:

1. Defendants' Motion for Reconsideration;
2. Defendants' Motion in Limine;
3. Defendants' Objections and Request for Pretrial Rulings as the Admissibility of the Following Portions of the Rule 15 Deposition Testimony of Pascual Conge;
4. Defendants' Objections and Request for Pretrial Rulings as the Admissibility of the Following Portions of the Rule 15 Deposition Testimony of Roberto Damasing;
5. Defendants' Objections and Request for Pretrial Rulings as the Admissibility of the Following Portions of the Rule 15 Deposition Testimony of Bryan Espina;
6. Defendants' Objections and Request for Pretrial Rulings as the Admissibility of the Following Portions of the Rule 15 Deposition Testimony of Edgar Villano;
7. Defendants' Objections and Request for Pretrial Rulings as the Admissibility of the Following Portions of the Rule 15 Deposition Testimony of Mario Manzanilla; and

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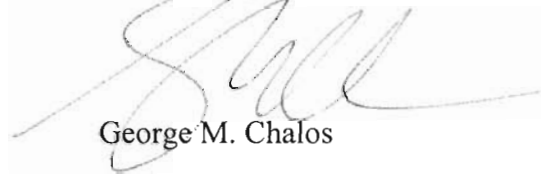
8. Defendants' Objections and Request for Pretrial Rulings as the Admissibility of the Following Portions of the Rule 15 Deposition Testimony of Paul Conge.

For your guidance, we provide herewith the original motions, plus one (1) copy. Additionally, we enclose an electronic copy of all the documents on the attached CD (in PDF format for electronic filing).

In advance, we thank you for your time and attention to this matter. Should you have any questions or comments, please feel free to contact the undersigned at anytime. In the meantime, and thanking you again for your assistance, we remain,

Respectfully yours,

CHALOS, O'CONNOR & DUFFY, LLP



George M. Chalos

GMC/gkk  
Enclosures

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